

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

ABIGAIL JORDAN and BERTA
JORDAN, individually,

Plaintiffs,

v.

CHATHAM COUNTY BOARD OF
EDUCATION, et. al.,

Defendants.

CASE NO. 1:22-cv-12

**PLAINTIFFS' UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO
DEFENDANTS' MOTION TO
DISMISS**

NOW COME Plaintiffs, Abigail Jordan and Berta Jordan, by and through their counsel, Keith Altman, with this Unopposed Motion for Extension of Time to Respond to Defendants' Motion to Dismiss and hereby state the following:

1. Defendants filed their Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), and 12(b)(6) on December 19, 2022 (ECFs 21, 22).
2. Plaintiff's Response to Defendant's Motion to Dismiss is due on January 9, 2023.
3. During the last month, Plaintiffs' attorney's firm has undergone significant staffing changes. Additionally, Plaintiffs' attorney is concurrently preparing for oral argument before the Supreme Court in February.

4. Plaintiffs respectfully request a 30-day extension of time to file their Response to Defendants' Motion to Dismiss, making the Response due on or before February 8, 2022.

5. Plaintiffs have conferred with the Defendants on the details of the present Motion and Defendants have advised that they will not oppose the Motion.

6. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

WHEREFORE the Plaintiffs request that the Court approve the foregoing Motion.

Dated: December 20, 2022

Respectfully Submitted,

/s/ Keith Altman

Keith Altman, Esq. (*pro hac vice*)

LAW OFFICE OF KEITH ALTMAN

33228 West 12 Mile Road, Suite 375

Farmington Hills, Michigan 48334

Telephone: (248) 987-8929

keithaltman@kaltmanlaw.com

Attorney for Plaintiffs

WORD COUNT CERTIFICATION

Pursuant to Local Rule 7.3(d), I hereby certify that the foregoing Motion is less than 6,250 words (excluding caption, signature line, and certificates of counsel) as reported by the word-processing software.

This 20th day of December 2022.

/s/Keith Altman
Keith Altman, Esq.

CERTIFICATE OF SERVICE

The undersigned hereby states that on December 20, 2022, he caused the foregoing document to be filed electronically with the Clerk of the Court using CM/ECF which will send notification of such to all counsel of record.

This 20th day of December 2022.

/s/Keith Altman
Keith Altman, Esq.